8-2-86

DECLARATION OF GERALD ARMSTRONG

I, Gerald Armstrong, declare:

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1. I am making this declaration in response to the 5 6 allegations made in the reply of cross-defendant Scientology organization in support of its motion to initiate an investigation 7 of alleged violations of temporary restraining order re contempt. 8 9 2. Although I have never met LaVenda Dukoff and have only spoken to her on the one occasion she is refering to at paragraph 10 19 of her affidavit of June 9, 1986, I have known about her and 11 12 her involvement and litigation with the organization for several I had written a couple of affidavits for her on issues years. 13 about which I had factual knowledge which arose in her litigation. 14 Ms. Dukoff's case had settled before I started working for Michael 15 Flynn in September 1985, so her name rarely came up in office 16 17 conversations. The main impression I formed about her up to the 18 time of her call was that she was a victim of Scientology and I became aware last fall, when the organization filed unstable. 19 20 the original motion to initiate an investigation, of its claim, which it based on one of the many affidavits Paulette Cooper 21 signed for it on March 4, 1985, that in the fall of 1982 Ms. 22 Dukoff had telephoned Ms. Cooper and said "Mike (Flynn) showed me 23 24 the Armstrong documents that were under seal." I was aware of the organization's use of its victims and purchased false 25 26 testimony in its operations (see declarations of Paulette Cooper, Joseph Flanagan, and Michael Flynn of September 30, 1985 re 27 Ala Fadili Al Tamimi and other paid criminals) and I speculated 28

1 when I saw the organization's motion to initiate an investigation that Ms. Dukoff might herself be involved in a Scientology operation. I was, therefore, very alert and very careful when she announced herself on the telephone around the beginning of June.

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6 3. Ms. Dukoff's call came in on an afternoon when the 7 office was normally closed, because there were only two people 8 there, myself and attorney Robert Joyce. Michael Flynn had left 9 for home only moments before, and following my conversation with 10 Ms. Dukoff I reached him on his car phone and related the details. 11 The phone rang, I answered, and a woman asked for Mr. Flynn. I 12 said he was not in and asked if I could take a message. She gave 13 her name and I gave mine. She immediately announced that she had 14 sealed documents from my case and she was going to take them to 15 the press to get Mike Flynn. As soon as she made the threat, 16 I put her on hold, asked Mr. Joyce to come into my office to hear 17 the call, then switched her onto the speaker phone when I took her 18 off hold. Mr. Joyce was therefore present and heard all of what 19 Ms. Dukoff and I said, except for the first sentence noted above, 20 a threat she repeated a number of times throughout our 21 conversation.

22 4. Ms. Dukoff states that she "described some of these 23 documents" to me, documents she earlier states at paragraph 18 24 Mr. Flynn said were under seal and for which he or she "could go 25 to jail." In our conversation, she refered to the documents she 26 claimed to possess as "Armstrong documents" or "sealed documents." 27 She did describe, at my request, two or three of these documents, 28 but very sketchily and, even after some questioning by me, she

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1 could not describe any of her documents with enough specificity 2 for me to identify them or any as "Armstrong documents"; i.e. 3 any of those documents I obtained from Omar Garrison and sent to 4 my attorneys in 1982, and subsequently delivered to the Clerk 5 of the Los Angeles Superior Court pursuant to the Temporary 6 Restraining Order issued August 24, 1982. The only document Ms. 7 Dukoff was able to describe at all intelligently was a "will", the 8 original of which she said she copied, but she did not know its 9 date or content. I even told Ms. Dukoff that there was no way 10 from what she was telling me that I could know that she even had sealed documents. 11

12 5. Ms. Dukoff's statement that I told her "that exposure 13 of the dissemination of these documents would destroy (my) court 14 case against the Church of Scientology" is incorrect. The only 15 thing I said to her repeated threats to go to the press with 16 "sealed documents" or cause Mr. Flynn or me trouble, was "you've 17 got to do what you've got to do." I never considered, nor do I 18 consider, that Ms. Dukoff's going to the press, or Scientology, 19 or anyone else with sealed documents, or forged documents, or 20 any other kind of documents, would destroy my court case. Ι 21 would not state such a thing, not only because I was aware from 22 the outset that the whole Dukoff document affair was likely a 23 Scientology operation, but because in truth I do not feel that 24 way. It was Ms. Dukoff who said that her going to the press with 25 sealed documents would hurt me.

26 6. Ms. Dukoff's statement that I "obviously recognized
27 these documents as (I) became very upset" is a false conclusion
28 based on falsehoods. I did not recognize any of the Dukoff

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1	documents and did not become upset. I remained calm, did not
2	raise my voice, and said nothing which could be interpreted by
3	any rational person as becoming "very upset." I was, however,
4	saddened by Ms. Dukoff's call, by her attack on Mr. Flynn, who
5	she said had "fucked" her and whom she was now "going to fuck,"
6	and by the fact the call evidenced another Scientology operation.
7	Following the call I was acutely depressed. Virtually all of
8	Ms. Dukoff's recitation of our conversation is false.
9	Executed this 2nd day of August, 1986 at Boston,
10	Massachusetts.
11	I declare under the penalty of perjury under the laws
12	of the State of California that the foregoing is true and correct.
13	11 At
14	A.T.
15	Gerald Armstrong
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